

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

No. 12-md-2323 (AB)

MDL No. 2323

THIS DOCUMENT RELATES TO:

Plaintiffs' Master Administrative Long-
Form Complaint and:

Robert Massey, et al. v. National Football
League, et al. (Plaintiffs Gary Burley and
Barbara Knight ONLY)

Court File No. 2:12-cv-6069-AB

**MOTION FOR LEAVE TO
WITHDRAW AS COUNSEL
FOR PLAINTIFFS GARY BURLEY
AND BARBARA KNIGHT**

J. Gordon Rudd, Jr., Brian C. Gudmundson, and Michael J. Laird of Zimmerman Reed LLP ("Plaintiff's Counsel"), move this Court pursuant to Pennsylvania Rule of Professional Conduct 1.16(b)(1) and United States District Court for the Eastern District of Pennsylvania Local Rule of Civil Procedure 5.1(c) to withdraw as counsel in relation to the claims of Gary Burley and Barbara Knight only in this action, and state as follows:

1. Plaintiffs' counsel filed the action *Robert Massey, et al. v. National Football League, et al.*, No. 2:12-cv-6069-AB, in the Eastern District of Pennsylvania on September 27, 2012, for the benefit of several retired National Football League players, including Gary Burley and Barbara Knight.

2. Plaintiffs' counsel filed a short form complaint for Gary Burley and Barbara Knight on October 29, 2012.

3. Since then, irreconcilable differences have arisen between Plaintiffs Gary Burley, Barbara Knight, and the undersigned.

4. Plaintiffs' counsel properly notified Gary Burley and Barbara Knight of counsel's intention to withdraw from representing them in this matter.

5. Under the circumstances, it is apparent that the undersigned must move the Court for leave to withdraw as counsel.

WHEREFORE, Plaintiffs' counsel respectfully requests this Court for leave to withdraw as counsel for Gary Burley and Barbara Knight only in Court File No. 2:12-cv-6069-AB.

Dated: May 6, 2019

Respectfully submitted,

ZIMMERMAN REED LLP

s/ Brian C. Gudmundson

J. Gordon Rudd, Jr. (#222082)

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